## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In Re:

LUIS ANTONIO COLON REYES ANA IRMA ROLON SANCHEZ

Debtor(s)

CASE NO.: 10-08867-BKT

CHAPTER -13-

## MOTION REQUESTING RECONSIDERATION OF ORDER LIFTING THE AUTOMATIC STAY IN FAVOR OF DORAL BANK

## TÓ THE HONORABLE COURT:

COMES NOW DEBTOR through the undersigned attorney and to this Honorable Court respectfully alleges and prays as follows:

- 1. Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, under which a payment plan was confirmed.
- 2. On August 29, 2013, Doral Bank filed a Motion for Relief from Stay, stating that debtor(s) accumulated post petition arrears including late charges and legal fees and costs totaling \$2,197.74...
- 3. On September 19, 2013, an Order Lifting the Automatic Stay in favor of Movant was entered.
- 4. With this motion debtor is/are submitting evidence of payments made to Doral Bank for the months of April and August 2013. (Evidence attached)
- 5. Debtor(s) is/are submitting a Post Confirmation Modification Payment Plan to provide funds necessary to cure post petition arrears with Doral Bank.
- 6. Debtor(s) hereby request a reconsideration of order lifting the automatic stay for all the reasons above stated. Debtor's intentions are to complete the proposed base of Chapter 13 plan.
- 7. The reconsideration and the setting aside of the order of lifting the automatic stay would not harm the interest of creditors involved, and on the other hand they would benefit from the reconsideration of the case since they would be able to continue receiving payments.

WHEREFORE IT IS RESPECTFULLY requested from this Honorable Court to reconsider the order lifting automatic stay and vacate and set aside the same.

<u>NOTICE</u> is hereby given that if no written objections are filed within 21 days to the reconsideration of Order the same will be granted without a hearing. Absent good cause untimely objections will be denied.

CERTIFICATE OF SERVICE: A copy of the foregoing motion has been made to be filed with the Clerk of the Court using the CM/ECF system that will electronically notify Chapter 13 Trustee, Alejandro Oliveras, US Trustee Office and to parties in interest that are participants of CM/ECF. Non CM/ECF participants will be notified by regular mail.

In Cayey, Puerto Rico this October 1st, 2013.

/s/Miriam A Murphy Lightbourn MIRIAM A. MURPHY LIGHTBOURN PO BOX 372519 CAYEY, PUERTO RICO 00737

TEL: 787-263-2377 FAX: 787-738-4667

Email: mamurphy0@prtc.net

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UNITED STATES Page 3 of 4 CUSTOMER'S RECEIPT



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